

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO: 04-10246

LORENZO GUARINO,
Plaintiff

v.

R.W. GRANGER AND SONS, INC. &
SCAVONE C&M CONSTRUCTION CO., INC.,
Defendants

**THE DEFENDANT'S, SCAVONE C&M CONSTRUCTION CO., INC.,
RULE 26(a)(2) EXPERT WITNESS DISCLOSURES**

The Defendant, Scavone C&M Construction Co., Inc. ("Defendant"), hereby makes this its expert witness disclosures through undersigned counsel, pursuant to and in accordance with Rule 26 of the Federal Rules of Civil Procedure, reserving the right to supplement and amend.

The Defendant anticipates calling the following persons to testify as expert witnesses in this matter:

1. **John P. O'Donovan, P.E., CSHM**
124 Tallman Avenue
Cranston, RI 02910

The Defendant anticipates calling construction safety expert John P. O'Donovan as an expert witness in this matter. Mr. O'Donovan is expected to testify consistent with his written report which is attached hereto as Appendix I. Mr. O'Donovan's education, experience and prior expert testimony are set forth in his C.V. which is attached as Appendix IA. Mr. O'Donovan's rate schedule is \$200 an hour for record review and testimony in this matter.

2. **Norman C. Hursh, Sc.D.**
Boston University
Sargent College of Health
and Rehabilitation Sciences
Dept. of Rehabilitation Counseling
635 Commonwealth Avenue
Boston, MA 02215

The Defendant anticipates calling vocational expert, Norman Hursh, as an expert witness in this matter. Dr. Hursh is expected to testify consistent with his written report which is attached hereto as Appendix II. Dr. Hursh's education, experience, publications and prior expert testimony are set forth in his C.V. which is attached as Appendix IIA. Dr. Hursh's rate schedule is \$240 an hour for record review and \$340 an hour for testimony in this matter.

3. **Hyman Glick, M.D.**
Chief of Orthopedics
Harvard Vanguard Medical Associates

The Defendant anticipates calling orthopedist Dr. Hyman Glick as an expert witness in this matter. Dr. Glick is expected to testify consistent with his written report which is attached hereto as Appendix III. Dr. Glick's education, experience, publications and prior testimony are set forth in Dr. Glick's C.V. which is attached hereto as Appendix IIIA. Dr. Glick's rate schedule is \$350 an hour for record review and \$300 for testimony in this matter.

4. **Professor Harold Petersen**
Economic Department
Boston College
Chestnut Hill, MA 02467

The Defendant anticipates calling economic expert Harold Peterson as an expert witness in this matter. The Plaintiff has not provided sufficient information at this point

in time to allow Professor Petersen to conduct a review and analysis of this matter. The Defendant states that it will supplement this disclosure as appropriate.

Respectfully submitted,

The Defendant,
Scavone C&M Construction Co., Inc.,
By its attorneys,



Mark B. Lavoie, BBO# 553204
Christopher W. Costello BBO# 645936
McDonough, Hacking & Lavoie, LLC
6 Beacon Street, Suite 815
Boston, MA 02108
(617) 367-0808

Dated: _____

April 29, 2006

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing pleading on all parties by electronic service, to all counsel of record.

Signed under the pains and penalties of perjury.

DATED: _____

April 28, 2006

